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LexisNexis Risk Solutions Inc.

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8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA
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10 REGINALD RASCON,

11 Plaintiff,

12 v.

13 LEXISNEXIS RISK SOLUTIONS INC.;
14 COLLECTO INC. DBA EOS CCA; AND
MIDLAND CREDIT MANAGEMENT
15 INC.

16 Defendants.

Case No. 2:20-cv-01510-APG-VCF

**STIPULATION AND ORDER TO EXTEND
TIME TO ANSWER OR OTHERWISE
PLEAD**

(FIRST REQUEST)

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18 Pursuant to Local Rule IA 6-1 of the United States District Court for the District of Nevada,
19 Defendant LexisNexis Risk Solutions Inc. ("LNRS") and Plaintiff Reginald Rascon ("Plaintiff"),
20 by and through their respective counsel, hereby stipulate as follows:

- 21 1. Plaintiff filed his Complaint on August 17, 2020;
- 22 2. LNRS was served with the Complaint on August 18, 2020;
- 23 3. LNRS's deadline to answer or respond to Plaintiff's Complaint is September 8,
24 2020;
- 25 4. LNRS has requested, and Plaintiff has consented to, an additional thirty (30) days
26 for LNRS to file an Answer or otherwise respond to the Complaint;
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1 5. An additional thirty (30) days for LNRS to answer or respond to Plaintiff's
2 Complaint will not alter the date of any event or deadline already fixed by the Court or prejudice
3 any party;

4 6. Good cause exists to grant the stipulation as the additional thirty (30) days are
5 needed to allow LNRS to complete its investigation of Plaintiff's allegations, including a review of
6 all relevant documents;

7 7. Pursuant to Civil Local Rules 6.2 and 7.1, Plaintiff and LNRS agree that LNRS shall
8 have up to and including October 8, 2020 to file a responsive pleading to Plaintiff's Complaint.

9 8. WHEREAS, this is the first request by the Parties seeking such extension;
10 THEREFORE, in consideration of the foregoing, and for good cause, IT IS HEREBY
11 STIPULATED AND AGREED by and between the Parties as follows:

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Defendant LEXISNEXIS RISK SOLUTIONS INC., shall have up to and including October 8, 2020 to file an Answer or Otherwise Plead to Plaintiff's Complaint.

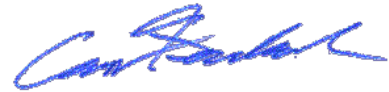
IT IS SO STIPULATED.

DATED this 26th day of August, 2020.

<p><u>/s/ Shaina R. Plaksin, Esq.</u> Matthew I Knepper, Esq. Nevada Bar No. 12796 Shaina R. Plaksin, Esq. Nevada Bar No. 13935 KNEPPER & CLARK LLC 5510 S. Fort. Apache Rd, Suite 30 Las Vegas, NV 89148-7700 Phone: (702) 856-7430 Fax: (702) 447-8048 Email: matthew.knepper@knepperclark.com Email: Shaina.plaksin@knepperclark.com</p> <p>David H. Krieger, Esq. Nevada Bar No. 9086 KRIEGER LAW GROUP LLC 500 N. Rainbow Blvd., Suite 300 Las Vegas, NV 89107 Phone: (702) 848-3855 Email: dkrieger@kriegerlawgroup.com Attorneys for Plaintiff</p>	<p><u>/s/ Gary E. Schnitzer</u> GARY E. SCHNITZER, ESQ. Nevada Bar No. 395 KRAVITZ, SCHNITZER & JOHNSON, CHTD. 8985 South Eastern Avenue, Suite 200 Las Vegas, Nevada 89123 Telephone: (702) 222-4142 Facsimile: (702) 362-2203 Email: gschnitzer@ksjattorneys.com Attorney for Defendant LexisNexis Risk Solutions Inc.</p>
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IT IS ORDERED

DATED this 27th day of August, 2020.



United States Magistrate Judge